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**via ELECTRONIC FILING**

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The Honorable Jerrold N. Poslusny, U.S.B.J.  
United States Bankruptcy Court  
U.S. Post Office and Courthouse  
401 Market Street  
Camden, NJ 08101

**RE: In re Ernest M. Howard**  
**Case No.: 17-22202-JNP**  
**Our File No.: 13819**  
**McCormick 106, LLC's Objection to Confirmation**

Dear Judge Poslusny:

This firm represents secured creditor, McCormick 106, LLC (the "Lender") in the above referenced bankruptcy case. Kindly accept this letter brief in lieu of a more formal objection to confirmation.

As the Court will recall, McCormick is a secured creditor with a mortgage on the real property located at: 5303 Harding Way, Unit 107, Mays Landing, New Jersey (the "Property"). After a significant amount of litigation, on or about December 6, 2017, the Court entered an Order granting McCormick relief from the automatic stay to proceed against the Property in a foreclosure action (the "Order"). See Doc 68. The Order specifically provides that "[t]he Debtor is not afforded any further opportunities to catch up and/or to seek to reimpose the automatic stay." *Id.* However, the Debtor's Plan [Doc 21] still provides for the cure and reinstatement of the loan to McCormick and has not been modified since the Order was entered.

Based upon the unequivocal language of the Order, McCormick objects to the confirmation of the Debtor's Plan to the extent that it would affect McCormick's rights under the Order and/or to proceed with its rights as a secured creditor in the foreclosure action. We thank the Court for its time and consideration in this regard.

Respectfully submitted,  
**DEMBO, BROWN & BURNS LLP**

A handwritten signature in black ink, appearing to be "K. Eingorn", is enclosed within a hand-drawn circle.

Kyle F. Eingorn

KFE/nv

Cc: Steven A. Silnutzer, Esquire  
Isabel Balboa, Esquire  
Joseph Orzolek